

CHARLES D. JENKINS - SBN 114897
DAN D. KIM - SBN 212577
JENKINS, GOODMAN, NEUMAN & HAMILTON LLP
417 Montgomery Street, 10th Floor
San Francisco, California 94104
Telephone: 415/705-0400
Facsimile: 415/705-0411

DAVID L. HARTSELL - Appearing *Pro Hac Vice*
MCGUIREWOODS, LLP
77 W. Wacker Drive, Suite 4100
Chicago, IL 60601
Telephone: (312) 558-1000
Facsimile: (312) 750-8600

Attorneys for Defendants AMERICAN CORRECTIVE COUNSELING
SERVICES, INC. and GEORGE KENNEDY, in his official capacity

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ELENA del CAMPO, on behalf of
herself and all others similarly situated,

Plaintiffs,

vs.

GEORGE KENNEDY, AMERICAN
CORRECTIVE COUNSELING
SERVICES, INC., DON R.
MEALING, BRUCE D. RAYE,
LYNN R. HANSEY a/k/a R. D.
DAVIS and DOES 1 through 20.

Defendants.

Case No. C 01-21151 JW (PVT)

Related Case No. C 03-02611 JW

**STIPULATION AND ORDER
CONTINUING HEARING ON
MOTION TO PRECLUDE
DESTRUCTION OF DOCUMENTS**

Date: August 8, 2006

Time: 10:00 a.m.

**Courtroom: 5 – Magistrate Judge
Patricia V. Trumbull**

Defendants, through their counsel Charles D. Jenkins and Todd M. Sloan, and
plaintiffs, through their counsel Paul Arons, hereby stipulate that the hearing of plaintiff's
motion to preclude destruction of documents shall be continued from August 8, 2006 to
September 12, 2006, at 10:00 a.m. in Department 5. The prohibition against destroying

1 tapes of telephone calls shall remain in effect until the new hearing date. The due dates for
2 the opposition and reply briefs of the respective parties shall be based on the new hearing
3 date.

4 So Stipulated.

5 Dated: June 20, 2006

JENKINS, GOODMAN, NEUMAN &
HAMILTON LLP

7
8 By: /s/

CHARLES D. JENKINS
Attorneys for Defendants American
Corrective Counseling Services, Inc. and
George Kennedy

10
11 Dated: June 20, 2006

ROSS, DIXON & BELL LLP

12
13 By: /s/

TODD M. SLOAN
Attorneys for Defendants Don Mealing,
Lynn Hasney, Fundamental
Performance Strategies, Fulfillment
Unlimited, Inc. Fundamentals and
ACCS Administration, Inc.

14
15
16
17 Dated: June 20, 2006

LAW OFFICES OF PAUL ARONS

18
19
20 By: /s/

PAUL ARONS
Attorneys for Plaintiffs

21
22 IT IS SO ORDERED.

23
24 Dated: June 23, 2006



PATRICIA B. TRUMBULL
United States Magistrate Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

f:\docs\cdj\delcampo\pleadings\stipulation and order to extend time of hearing - 6-20-06.doc